

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	
	)	Chapter 11
YELLOW CORPORATION, <i>et al.</i> , <sup>1</sup>	)	
	)	Case No. 23-11069 (CTG)
	)	
Debtors.	)	(Jointly Administered)
	)	
	)	
	)	<b>Re: Docket No. 22</b>

**NOTICE OF FILING OF REVISED ORDER (I)(A) APPROVING BIDDING  
PROCEDURES FOR THE SALE OR SALES OF THE DEBTORS' ASSETS;  
(B) SCHEDULING AUCTIONS AND APPROVING THE FORM AND MANNER  
OF NOTICE THEREOF; (C) APPROVING ASSUMPTION  
AND ASSIGNMENT PROCEDURES, (D) SCHEDULING SALE  
HEARINGS AND APPROVING THE FORM AND MANNER OF NOTICE  
THEREOF; (II)(A) APPROVING THE SALE OF THE DEBTORS' ASSETS  
FREE AND CLEAR OF LIENS, CLAIMS, INTERESTS AND ENCUMBRANCES  
AND (B) APPROVING THE ASSUMPTION AND ASSIGNMENT OF EXECUTORY  
CONTRACTS AND UNEXPIRED LEASES; AND (III) GRANTING RELATED RELIEF**

**PLEASE TAKE NOTICE OF THE FOLLOWING:**

1. On August 7, 2023, the above-captioned debtors and debtors in possession (collectively, the "Debtors") filed the *Motion of the Debtors for Entry of an Order (I)(A) Approving Bidding Procedures for the Sale or Sales of the Debtors' Assets; (B) Scheduling an Auction and Approving the Form and Manner of Notice Thereof; (C) Approving Assumption and Assignment Procedures, (D) Scheduling a Sale Hearing and Approving the Form and Manner of Notice Thereof; (II)(A) Approving the Sale of the Debtors' Assets Free and Clear of Liens, Claims, Interests and Encumbrances and (B) Approving the Assumption and Assignment of*

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<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of Debtors' principal place of business and the Debtors' service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

*Executory Contracts and Unexpired Leases; and (III) Granting Related Relief* (the “Motion”)<sup>2</sup> [Docket No. 22], which attached the proposed Bidding Procedures Order to approve, among other things, the Bidding Procedures attached thereto as Exhibit A.

2. Pursuant to the notice of hearing on the Motion [Docket No. 378], objections to the Motion were due to be filed on or before September 8, 2023 at 4:00 p.m. (ET) (the “Objection Deadline”) and a hearing on the Motion was scheduled for September 15, 2023 at 11:30 a.m. (ET) (the “Hearing”).

3. Attached hereto as Exhibit A is a revised version of the Bidding Procedures Order (the “Revised Bidding Procedures Order”), which attaches a revised version of the Bidding Procedures at Exhibit 1 thereto (the “Revised Bidding Procedures”). The Revised Bidding Procedures Order and the Revised Bidding Procedures include comments from various of the Debtors’ stakeholders. Attached hereto as Exhibit B is a redline of the Revised Bidding Procedures Order reflecting changes against (a) the original Bidding Procedures Order filed with the Motion and (b) the original Bidding Procedures attached to the original Bidding Procedures Order.

4. The following parties have consented to, or do not object to, entry of the Revised Bidding Procedures Order (including the Revised Bidding Procedures): (i) the Junior DIP Secured Parties, (ii) the B-2 Secured Parties (including the Prepetition B-2 Secured Parties and the Postpetition B-2 Secured Parties), (iii) the Prepetition ABL Secured Parties, (iv) the Prepetition UST Secured Parties, (v) the Creditors’ Committee, (vi) the Office of the United States Trustee, and (vii) the Real Estate Stalking Horse Bidder.

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<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meaning given to them in the Motion.

5. In addition, the below parties (the “Responding Parties”) filed responses, reservations of rights, or joinders. The Debtors are attempting to resolve any remaining outstanding objections, responses, or comments from the Responding Parties in advance of the Hearing. The Debtors intend to present the Revised Bidding Procedures Order (including the Revised Bidding Procedures) to the Court at the Hearing and reserve all rights to modify the Revised Bidding Procedures Order (including the Revised Bidding Procedures) in advance of the Hearing.

Docket No.	Party:
417	Chubb Companies
424	Peapack Capital Corporation
426	Orange Batavia I, LLC
430	East West Bank
432	Valley National Bank
436	Hawkey Transportation
439	PPF Sudberry Ocean View Hills, L.P.

Dated: September 11, 2023  
Wilmington, Delaware

/s/ Laura Davis Jones

Laura Davis Jones (DE Bar No. 2436)

Timothy P. Cairns (DE Bar No. 4228)

Peter J. Keane (DE Bar No. 5503)

Edward Corma (DE Bar No. 6718)

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-and-

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